

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re:	Case No.: 24-70418-JAD
POTTSVILLE OPERATIONS, LLC, <i>et al.</i> , ¹	Chapter 11
Debtors.	(Jointly Administered)
POTTSVILLE OPERATIONS, LLC, <i>et al.</i> ,	Related to Document Nos.: 121, 206, 291
Movants,	Hearing Date: January 15, 2025
-vs-	Hearing Time: 1:00 p.m. (prevailing Eastern Time)
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF POTTSVILLE OPERATIONS, LLC, <i>et al.</i>	Response Deadline: January 6, 2025, at 5:00 p.m. (prevailing Eastern Time)
Respondents.	

**THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS' RESPONSE AND RESERVATION OF RIGHTS
WITH RESPECT TO THE POTTSVILLE DEBTORS' NOTICE OF
PROPOSED SALE OF SUBSTANTIALLY ALL OF THE DEBTORS'
ASSETS, BIDDING PROCEDURES, AUCTION, AND SALE ORDER HEARING**

The Official Committee of Unsecured Creditors of Pottsville Operations, LLC *et al.*, (the “Committee”), by and through its undersigned proposed counsel, hereby submits this response and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Pottsville Operations, LLC (9467); Pottsville Propco, LLC (8685); Hampton House Operations, LLC (8969); Hampton House Propco, LLC (7258); Kingston Operations, LLC (1787); Kingston Propco, LLC (8562); Williamsport North Operations, LLC (9927); Williamsport Propco, LLC (2039); Williamsport South Operations, LLC (0298); Yeadon Operations, LLC (9296); and Yeadon Propco, LLC (5785) (collectively, the “Pottsville Debtors” and the Pottsville Debtors’ chapter 11 cases are collectively referred to as the “Pottsville Cases”) and Bedrock Care, LLC (9115); Care Pavilion Operating, LLC (7149); Cliveden Operating, LLC (6546); MAPA Operating, LLC (3750); Maplewood Operating, LLC (0850); Milton Operating, LLC (5523); Parkhouse Operating, LLC (0140); Tucker Operating, LLC (4305); Watsonstown Operating, LLC (0236); and York Operating, LLC (2571) (collectively the “Care Pavilion Debtors” and the Care Pavilion Debtors’ chapter 11 cases are collectively referred to as the “Care Pavilion Cases”). The Debtors’ mailing address is 425 West New England Avenue, Suite 300, Winter Park, Florida 32789.

reservation of rights (the “ROR”) with respect to the Pottsville Debtors’ *Notice of Proposed Sale of Substantially all of the Debtors’ Assets, Bidding Procedures, Auction, and Sale Order Hearing* (the “Sale”) [Dkt. No 291] with an auction set for to be held on January 13, 2025:

PRELIMINARY OBJECTION AND RESERVATION OF RIGHTS

1. On October 15, 2024, the Pottsville Debtors commenced their chapter 11 cases by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with this Court.

2. On October 25, 2024, the United States Trustee (the “U.S. Trustee”) filed its *Appointment of Official Committee of Unsecured Creditors* [Dkt. No. 108] (the “Formation Notice”), providing notice to all parties of the Committee’s formation.

3. On November 14, 2024, the Court entered the *Order (A) Approving Bidding Procedures for Sale of Substantially all of the Debtors’ Assets, Other Than Accounts, Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Approving Stalking Horse Bid Protection, (C) Scheduling Auction for and Hearing to Approve Sale of Substantially All of the Debtors’ Assets, (D) Approving Form and Manner of Notice of Sale, Auction, and Sale Order Hearing, (E) Approving Assumption and Assignment Procedures, (F) Authorizing Assumption and Assignment of Executory Contracts, and (G) Granting Related Relief* (the “Sale Order”) [Dkt. No. 206]. The Sale Order set January 6, 2025, at 5 p.m. EST as the deadline for objections to the Sale of the Debtors’ assets and the assumption and assignment of contracts.

4. The Committee continues to review the proposed Sale of the Debtors’ assets and the assumption and assignment of contracts as part of the Debtors’ Sale process. The Committee and Debtors have agreed to extend the Committee’s deadline to object to the Sale until noon EST on January 10, 2025. This agreement to extend the Committee’s objection deadline is

memorialized by email exchange pursuant to the terms of the Debtors' case management order [Dkt. No. 36]. Consequently, the Committee files this ROR on a preliminary basis to preserve its rights and intends to supplement this ROR with any objections remaining as of the end of noon on Friday January 10, 2025.

[Signatures on the following page]

Dated: January 6, 2025

/s/ Andrew C. Helman

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*Proposed Counsel to the Official Committee of
Unsecured Creditors of Pottsville Operations, LLC,
et al.*

CERTIFICATE OF SERVICE

I, Thomas D. Maxson, an individual eighteen years of age or older, hereby certify that on the date set forth below, I caused the foregoing document to be served on all parties receiving notice and service in this case through the Court's CM/ECF electronic filing service, which served the same on the parties receiving notice via the CM/ECF system.

Dated: January 6, 2025

/s/ Thomas D. Maxson

Thomas D. Maxson